

TCEQ Comments (04/15/2019)
2nd 80s Fire
Deer Park, Texas
Large Equipment and Vessel (Southwest Shipyard)
Decontamination Plan
Version 1.0
Date: 04/14/2019

General Comments:

- The plan should be consistent with the decon plan for activities at the Enterprise site (“Equipment Decon Plan”) and reference the same site safety, sampling, and waste management plans, as appropriate.
- Any recovered materials are assumed to be hazardous waste until a determination has been made in accordance with 30 TAC 335 Subchapter R and should be managed as such.
- All tanks and containers in storage must be in compliance with packaging, labeling, marking, placarding, accumulation time and recordkeeping per 30 TAC 335 Subchapter C.
- Define acronyms or provide glossary (e.g., MSRC, COTP, SBS)
- Identify parties, including “customer” and “contractor company”
- Address incomplete sentences and general grammar throughout document
- Define “fully contained area” (include design specifications and location of this area at the facility)
- Define baseline clean standard for all equipment and include a process for issuing a completed “Certification of Decontamination” form to document successful decontamination. TCEQ recommends collecting rinsate samples off of the equipment and comparing test results to TRRP Tier 1 drinking water PCLs. Assuming analytical data is used to document complete decontamination:
 - Revise the plan throughout to reference and conform to the requirements of the TCEQ Quality Assurance Project Plan (QAPP) and SW-846. Procedures for hazardous waste sampling, and handling of samples, must comply with the TCEQ QAPP for purposes of Quality Assurance/Quality Control (QA/QC). The Sampling Plan (or Waste Handling and Management Plan) should explicitly reference SW-846—Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods. See SW-846 Chapters 1, 2, 9, and 11 for descriptions of accepted sampling methods, plans, QA/QC and relevant procedures. American Society for Testing and Materials (ASTM) methods may be substituted with prior approvals in waste characterization and sampling, or in cases where the ASTM method is specified in regulations.
 - 30 Texas Administrative Code Section 25.1 states that the commission may accept environmental testing laboratory data and analyses for use in commission decisions regarding any matter under the commission's jurisdiction relating to permits or other authorizations, compliance matters, enforcement actions, or corrective actions only if the data and analyses are prepared by an environmental testing laboratory accredited by the commission under this chapter, except as provided in §25.6 of this title (relating

to Conditions Under Which the Commission May Accept Analytical Data). Revise the plan as necessary to reflect this requirement.

- This plan should address the safe and environmentally sound handling of contaminated vessels, boom, and equipment as well as addressing the disposition and characterization of collected spent wash solutions, drained liquids, decontamination equipment, PPE, etc. The OSHA information provided is a bit sparse and non-specific.
- How will the site be assessed for contamination after decon operations for this event have ended?
- How will equipment, such as booms, be transported to and from the Decon site to prevent spread of contamination from the emergency response operations area?
- Be aware that wash water generated during the cleaning process potentially contains listed hazardous waste. Review site TPDES permit to ensure that such wastewaters are authorized for treatment/disposal.

Preface: No comments

Section 1. 1.

- Specify which Southwest Shipyard location(s) for decontamination
- Must comply with relevant OSHA standards for hazardous waste operations

Section 1.1.1.a

- Define “proven experience in tank vessel cleaning and or stripping”

Section 1.1.1a. 1) and 2): No comments

Section 1.1.1.b. Define “thorough knowledge” and provide documentation of training and/or certification for 1) through 4)

Section 1.1.2. 1) No comment

Section 1.1.2. 2) Revise the wording in the second sentence beginning “Additionally ...” to clarify meaning.

Section 1.1.2. 3) No comment

MSRC 210 ft Oil Spill Response Vessels

Boom: contractor boom

- Rewrite second sentence “Any equipment cleaned..” to clarify meaning
- What criteria will be used to ensure Booms, vessels, and equipment are adequately cleaned/decontaminated to prevent spread of hazardous waste residues?
- Expand on the statement “Areas are hard to clean” by describing procedures in place for identifying and cleaning hard to clean areas

- Rewrite incomplete sentence starting with “Upon acceptance...” and clarify “back onto vessels with original quantities”
- Refer to “boom” as contaminated boom or used boom
- Specifically denote what the “special attention” is to be given to cable pockets and openings
- Define specifications to meet the “satisfaction of the customer representative” and identify the customer

EFC Sea Sentry Boom

- Refer to “boom” as contaminated boom or used boom
- Denote what the “special handling requirements” and define specifications to meet the “satisfaction of the customer representative” and identify the customer

Work Boats Section

- Identify the “contractor company” and clarify how this differs from the Customer.
- The standard for decontamination should be the same as that established in the “Equipment Decon Plan.”

“Decon Disposal” Section

- ‘Removal of product’ – change to removal of waste material or recovered material from response equipment
- 30 TAC Chapter 335 citations should be referenced along with EPA RCRA regulations
- In taking responsibility for the disposal of all wastes generated during the decontamination process, is Southwest Shipyard taking ownership of the recovered waste material and completion of waste shipping manifests on appropriated EPA forms for the disposal of RCRA waste? Additionally, all recordkeeping would be provided to ITC to include in their final report for submission.
- Waste determination must be conducted on the wash water generated during the cleaning process before being routed to the WWTP.
- The TPDES permit number referenced in the plan is incorrect. The permit referenced in the plan is WQ0002605000, when it should be WQ0002605000.
- Are all the pollutants that will be removed and routed through the wastewater treatment plant amenable to biotreatment? How was this determined? What will be done with wastewaters that are not treatable in the WWTP?
- The decontamination plan only included part of the permit for Southwest Shipyards (WQ0002605000). Southwest Shipyards is required to ensure they are in compliance with all of the “Other Requirements” listed in the permit and attach the entire copy of the TPDES.
- The permit authorizes the treatment and discharge of “third-party biotreatable wastewaters.” The “Other Requirements” section of the permit (page 15 of Permit, requirement 4) defines third-party biotreatable wastewater to include “wastewater that is from third-party sources, such as ... washing operations that are similar to the ongoing barge cleaning operations at Southwest Shipyard, L.P.”
 - Do these similar wastes include the firefighting foam residual that is likely to be a contaminant on vessels and booms?
- Are the four cleaning detergents listed at the end of the plan the same as those evaluated and approved during the permit application process for their current WQ permit?
- Does the designated cleaning area have the appropriate containment to prevent releases to the environment? Clarify further.

“SBS DECON PLAN” Section

- “MSDS” should be changed to “SDS”.

“Scope of Work” Section

- Explain what a consumable item is; what determines that this item cannot be cleaned; how will this waste be characterized and manifested if disposal is necessary; identify the customer representative.
- Disposal of consumable items and other wastes must be done in accordance with applicable state and federal regulations, not “as designated by the customer representative.”
- Who is responsible for removing “recovered product from the incident” from equipment prior to beginning the decontamination process?
 - Use the term “all recovered waste material” instead of “product”
 - Where and how will the removal be done?
 - How will the material be characterized to determine appropriate treatment or disposal methods?
- “[N]ot put off a sheen on the water when deployed” is not an appropriate decontamination standard. Decontamination endpoints should be consistent with the “Equipment Decon Plan.”

“Procedures SBS Pontoons” Section

- “Remove all remaining fluids from SBS pontoon tanks to shore side storage.” Do these fluids include “recovered product from the incident” discussed in the previous section?
- “Once pontoons are in decon pool perform air monitoring assessment of area and open tank hatches to begin ventilation.”
 - What equipment will be used?
 - What will air monitoring results be used for?
 - How will degassing of pontoons be done in compliance with applicable air quality regulations?

“Push Boats” Section

- “...to the satisfaction of the designated customer representative on site.” Again, the decontamination endpoint must be consistent with that defined in the “Equipment Decon Plan.”

“Decon Site” Section

- “Detailed map of the decon site should be included in the site safety plan.” Replace “should” with “will”.
- “The above list is not a required list and should be adjusted in accordance with the spacing and at the discretion of the decon forman and customer.” This section needs further expansion concerning the decon site, which must be clearly identified. Sufficient planning should be performed to ensure that adequate space, manpower, and resources are available to ensure complete decontamination of vessels and equipment used in the response.